

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jane Does 1-4,)	CIVIL ACTION FILE
)	NO. 1:21-cv-04278-WMR
Plaintiff,)	
)	
v.)	
)	
RED ROOF INNS, INC., et al.,)	
)	
Defendants.)	
)	

**DEFENDANT RED ROOF FRANCHISING, LLC'S SUPPLEMENT TO
THE AMENDED PROPOSED PRETRIAL ORDER (DOC 367)**

Defendants submit this Supplement to the Amended Proposed Pretrial Order (Doc. 367), which includes Defendants' Proposed Verdict Forms, labeled as Attachment I-2, as well as Defendants' Proposed Voir Dire, labeled Attachment B-2. Defendants' Proposed Voir Dire is identical to the Proposed Voir Dire attached to the original Pretrial Order (Doc. 313) as Attachment B-2, but was inadvertently left off of the filing on Friday, October 20, 2023.

Dated: October 23, 2023

/s/ Marcella C. Ducca

Marcella C. Ducca

Georgia Bar No. 115079

Brandon D. Cox

Georgia Bar No. 832025

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Attorneys for Defendants

RULE 7.1 D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 23, 2023

/s/ Marcella C. Ducca
Marcella C. Ducca
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2023, a copy of the above was filed electronically. Service of this filing will be made pursuant to Civ. R. 5(b)(2)(e) by operation of this Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Marcella C. Ducca
Marcella C. Ducca (115079)
Attorneys for Defendants

ATTACHMENT I-2

**DEFENDANTS' PROPOSED VERDICT
FORM – JANE DOE 1**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jane Doe 1, et al.,)	
)	
Plaintiffs,)	
)	
)	Case No. 1:21-cv-04278-WMR
v.)	
)	
Red Roof Inns, Inc., et al.,)	
)	
Defendants.)	

DEFENDANT’S PROPOSED VERDICT FORM FOR PLAINTIFF
JANE DOE 1

Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC (collectively, “Defendants”) submit the following proposed jury interrogatories and verdict form for Plaintiff Jane Doe 1. Defendants reserve the right to supplement this proposed verdict form up to and during the time of trial. Specifically, Defendants anticipate various legal issues will be resolved by the Court throughout trial, and resolution of such will necessitate or negate jury interrogatories. To the extent the Court determines issues of fact on various issues that may be presented to the jury, Defendants expressly reserve the right add, subtract, replace, or modify any requested interrogatory.

Further, Defendants have drafted this form using Plaintiff's pseudonym given the verdict form is to be filed. However, Defendants believe Plaintiff's true identity should be used at trial and in this verdict form when it is given to the jury.

Dated: October 23, 2023

Respectfully submitted,

/s/ Marcella C. Ducca

Marcella C. Ducca (Ga Bar No. 115079)

Brandon D. Cox (Ga Bar No. 832025)

GREENBERG TRAURIG LLP

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Attorneys for Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC

TVPRA Claims:

1. Do you find Jane Doe 1 proved by a preponderance of the evidence that she was sex trafficked by force, fraud, or coercion, in violation of the Trafficking Victims Protection Act?¹

Answer “Yes” or “No”

____ Yes ____ No

INSTRUCTION: If you answered yes to question #1, proceed to question #2. If you answered no, proceed directly to question #6.

2. Do you find Jane Doe 1 proved by a preponderance of the evidence that each defendant participated in a venture with her traffickers?

“Venture” means an undertaking or enterprise involving risk and potential profit.²

Answer “Yes” or “No”

Red Roof Inns, Inc.	____ Yes ____ No
Red Roof Franchising LLC	____ Yes ____ No
RRI West Management, LLC	____ Yes ____ No
RRI III, LLC (Buckhead)	____ Yes ____ No
FMW RRI NC, LLC (Smyrna)	____ Yes ____ No

INSTRUCTION: If you answered yes to question #2, proceed to question #3. If you answered no, proceed directly to question #6.

3. Do you find that Jane Doe 1 proved by a preponderance of the evidence that each defendant knowingly benefited from participation in a venture with her traffickers?³

A venture is defined as a common undertaking or enterprise involving risk and potential profit.⁴

¹ Doe #1 v. Red Roof Inns, Inc., 21 F.4th 714, 723 (11th Dist. 2021); 18 U.S.C. §1591(b)(1).

² Doe #1, 21 F.4th at 719.

³ Doe #1, 21 F.4th at 724-725; 18 U.S.C. § 1595(a).

⁴ Doe #1, 21 F.4th at 274-275.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

INSTRUCTION: If you answered yes to question #3, proceed to question #4. If you answered no, proceed directly to question #6.

4. Do you find that Jane Doe 1 proved by a preponderance of the evidence that the defendants participated in a venture they knew or should have known engaged in the sex trafficking of, and as to, Plaintiff Jane Doe 1 at the Buckhead or Smyrna properties?⁵

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

⁵ Doe #1, 21 F.4th at 725 (“the defendant had constructive or actual knowledge that the undertaking or enterprise violated the TVPRA as to the plaintiff.”); *A.B. v. Hilton Worldwide Holdings, Inc.*, 484 F.Supp.3d 921, 938 (2020) (requiring the plaintiff to allege “Defendants knew or should have known of the alleged trafficking of Plaintiff A.B. on their corresponding properties.”); *see e.g., J.C. v. I Shri Khodiyar, LLC*, 624 F. Supp. 3d 1307, 1319 (N.D. Ga. 2022) (finding knowledge was adequately plead because there were facts showing the defendant had constructive knowledge that the plaintiff herself was being trafficked); *J.G. v. Northbrook Indus., Inc.*, 619 F. Supp. 3d 1228, 1238 (N.D. Ga. 2022) (“the Court finds that Plaintiff has adequately alleged that Northbrook had actual or constructive knowledge of **Plaintiff's sex trafficking** at the United Inn.”); *A.D. v. Cavalier MergerSub LP*, No. 2:22-CV-649-JES-NPM, 2023 WL 3073599, at *4 (M.D. Fla. Apr. 25, 2023) (“Plaintiff must plausibly allege that Defendants at least constructively knew “ ‘that the venture in which they participated and from which they benefited violated the TVPRA as to’ A.D.”); *A.G. v. Northbrook Indus., Inc.*, No. 1:20-CV-05231-JPB, 2022 WL 1644921, at *4 (N.D. Ga. May 24, 2022) (“The Court finds that Plaintiff has adequately alleged that Defendant had actual or constructive knowledge of Plaintiff's sex trafficking at the hotel.”).

INSTRUCTION: If you answered yes to question #4, proceed to question #5. If you answered no, proceed directly to question 6#.

5. If you have answered yes in all of questions 1-4 for any defendant, enter a verdict on behalf of Jane Doe 1 against that Defendant for Plaintiff's TVPRA claim, sign the below, and proceed to Question #6.

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

RICO Claims:

6. Did Jane Doe 1 prove, by a preponderance of evidence, that that the defendants were involved in a pattern of racketeering activity or derived proceeds therefrom, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise, real property, or personal property of any nature, including money.⁶

“Pattern” means at least two incidents of racketeering activity in furtherance of one or more incidents, schemes, or transactions.⁷

“Racketeering activity” means to commit, to attempt to commit, or to solicit, coerce, or intimidate another person to commit, any crime which is chargeable by indictment under Georgia law.⁸

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #6, proceed to question #7. If you answered no, proceed directly to question #11.

7. Did Jane Doe 1 prove, by a preponderance of the evidence, that defendants intentionally aided and abetted in the commission of, or intentionally advised, encouraged, hired, or counseled another to commit the following crime:⁹ Keeping a Place of Prostitution?

A person commits the crime of keeping a place of prostitution if that person, having or exercising control over the use of any place, knowingly grants or permits the use of such place for the purpose of prostitution.¹⁰ Prostitution occurs when a

⁶ O.C.G.A. 16-14-4(a).

⁷ O.C.G.A. 16-14-3(4)(A).

⁸ O.C.G.A. 16-14-3(5)(A).

⁹ O.C.G.A. 16-2-20(b)(1-4).

¹⁰ O.C.G.A. 16-6-10.

person performs or offers or consents to perform a sexual act for money or other items of value.¹¹

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #7, proceed to question #8. If you answered no, proceed directly to question #11.

8. Do you find that Jane Doe 1 proved, by a preponderance of the evidence, that the defendants’ crimes were directed towards her, as opposed to third parties, and that she was an intended victim of the defendants’ actions.¹²

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #8, proceed to question #9. If you answered no, proceed directly to question 11.

¹¹ O.C.G.A. 16-6-9.

¹² *American General Life and Acc. Ins. Co. v. Ward*, 509 F.Supp.2d 1324, 1331 (N.D.GA 2007) (finding that a scheme intended to deprive an entire class of persons (there, African Americans) of benefits by charging higher premiums was not valid because the RICO violation was directed towards individuals other than the defendants); *Wylie v. Denton*, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015); *Maddox v. Southern Engineering Co.*, 231 Ga.App. 802, 806 (Ga Ct. App. 1998) (holding that RICO requires a showing that the injury “flowed directly from the defendant’s” conduct “not merely that his injury was an eventual consequence of the [predicate act] or that he would not have been injured but for the [predicate act.]”

9. Do you find that Jane Doe 1's alleged injury was directly caused, as opposed to an eventual consequence, of the defendants' violation of a crime.¹³

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

10. If you have answered yes in all of questions 6-9 for any defendant, enter a verdict on behalf of Jane Doe 1 against that Defendant for Plaintiff's RICO claim, sign the below, and proceed to Question 11.

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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¹³ Wylie v. Denton, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015)

RICO Conspiracy

11. Did Plaintiff Jane Doe 1, prove by a preponderance of the evidence, that the Defendants knowingly and willfully committed an overt act in effect of a conspiracy to traffic Jane Doe 1, or committed such an act, with Jane Doe 1's traffickers.¹⁴

Answer "Yes" or "No"

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

¹⁴ Doe #1, 21 F.4th at 728; O.C.G.A. §16-14-4(c).

Negligence claims:

12. Do you find that Jane Doe 1 proved by a preponderance of evidence that as to the Buckhead location only, any of the Defendants were negligent?

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #12, proceed to question #13. If you answered no, proceed directly to question 15.

13. Do you find that Jane Doe 1 proved by a preponderance of evidence that any of the Defendants’ negligence proximately caused her injuries.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #13, proceed to question #14. If you answered no, proceed directly to question 15.

14. If you have answered yes in all of questions 12-13 for any defendant, enter a verdict on behalf of Jane Doe 1 against that Defendant for Jane Doe 1’s negligence claims, sign the below, and proceed to Question 15.

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Damages:

15. If you answered Yes to Question 5, 10, 11, or 14 above, what amount of damages do you award to Jane Doe 1? If you answered No to Questions 5, 10, 11, and 14 above, do not answer Questions 15 – 19.

\$ _____

INSTRUCTION: Proceed to question 16. _____

16. To apportion Jane Doe 1's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

A Knight's Inn	_____ %
Best Value Inn by Vantage	_____ %
Cheshire Motor Inn	_____ %
FMW RRI NC, LLC (Smyrna)	_____ %
Homewood Suites	_____ %
Holiday Inn	_____ %
Hampton Inn	_____ %
Individuals that paid for sex with JD 1	_____ %
Jane Doe 1	_____ %
Laquinta Inn	_____ %
Mariott	_____ %
Microtel Inn & Suites	_____ %
Traffickers of Jane Doe 1	_____ %
Red Roof Inns, Inc.	_____ %
Red Roof Franchising, LLC	_____ %
Residence Inn	_____ %

RRI West Management, LLC	_____ %
RRI III, LLC (Buckhead)	_____ %
Suburban Extended Stay	_____ %
Varahi Hotel LLC	_____ %

The numbers must add up to 100%

INSTRUCTION: If you answered yes to Question 10, 11, or 14 proceed to Question 17. Otherwise, return this form to the bailiff.

17. Do you find that Jane Doe 1 proved by clear and convincing evidence that Defendants acted willfully or with malice, fraud, wantonness, oppression, or with a conscious indifference to consequences?¹⁵

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

INSTRUCTION: Proceed to question 18.

18. If you answered yes to Question 17, what amount of damages do you award to Jane Doe 1.

\$ _____

19. Divide that number in question 18 between each of the Defendants.

Red Roof Inns, Inc.	_____
Red Roof Franchising LLC	_____
RRI West Management, LLC	_____
RRI III, LLC (Buckhead)	_____
FMW RRI NC, LLC (Smyrna)	_____

¹⁵ O.C.G.A. §51-12-5-1.

This is our unanimous verdict, reached on the ____ day of December, 2023

Foreperson

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that that submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 23, 2023

/s/ Marcella C. Ducca _____
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 23, 2023, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Dated: October 23, 2023

/s/ Marcella C. Ducca
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

ATTACHMENT I-2

DEFENDANTS' PROPOSED VERDICT FORM – JANE DOE 2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jane Doe 2, et al.,)	
)	
Plaintiffs,)	
)	
)	Case No. 1:21-cv-04278-WMR
v.)	
)	
Red Roof Inns, Inc., et al.,)	
)	
Defendants.)	

DEFENDANT’S PROPOSED VERDICT FORM FOR PLAINTIFF
JANE DOE 2

Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC (collectively, “Defendants”) submit the following proposed jury interrogatories and verdict form for Plaintiff Jane Doe 2. Defendants reserve the right to supplement this proposed verdict form up to and during the time of trial. Specifically, Defendants anticipate various legal issues will be resolved by the Court throughout trial, and resolution of such will necessitate or negate jury interrogatories. To the extent the Court determines issues of fact on various issues that may be presented to the jury, Defendants expressly reserve the right add, subtract, replace, or modify any requested interrogatory.

Further, Defendants have drafted this form using Plaintiff's pseudonym given the verdict form is to be filed. However, Defendants believe Plaintiff's true identity should be used at trial and in this verdict form when it is given to the jury.

Dated: October 23, 2023

Respectfully submitted,

/s/ Marcella C. Ducca

Marcella C. Ducca (Ga Bar No. 115079)

Brandon D. Cox (Ga Bar No. 832025)

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Attorneys for Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC

TVPRA Claims:

1. Do you find Jane Doe 2 proved by a preponderance of the evidence that she was sex trafficked by force, fraud, or coercion, in violation of the Trafficking Victims Protection Act?¹

Answer “Yes” or “No”

____ Yes ____ No

INSTRUCTION: If you answered yes to question #1, proceed to question #2. If you answered no, proceed directly to question #6.

2. Do you find Jane Doe 2 proved by a preponderance of the evidence that each defendant participated in a venture with her traffickers?

“Venture” means an undertaking or enterprise involving risk and potential profit.²

Answer “Yes” or “No”

Red Roof Inns, Inc.	____ Yes ____ No
Red Roof Franchising LLC	____ Yes ____ No
RRI West Management, LLC	____ Yes ____ No
RRI III, LLC (Buckhead)	____ Yes ____ No
FMW RRI NC, LLC (Smyrna)	____ Yes ____ No

INSTRUCTION: If you answered yes to question #2, proceed to question #3. If you answered no, proceed directly to question #6.

3. Do you find that Jane Doe 2 proved by a preponderance of the evidence that each defendant knowingly benefited from participation in a venture with her traffickers?³

A venture is defined as a common undertaking or enterprise involving risk and potential profit.⁴

¹ Doe #1 v. Red Roof Inns, Inc., 21 F.4th 714, 723 (11th Dist. 2021); 18 U.S.C. §1591(b)(1).

² Doe #1, 21 F.4th at 719.

³ Doe #1, 21 F.4th at 724-725; 18 U.S.C. § 1595(a).

⁴ Doe #1, 21 F.4th at 274-275.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

INSTRUCTION: If you answered yes to question #3, proceed to question #4. If you answered no, proceed directly to question #6.

4. Do you find that Jane Doe 2 proved by a preponderance of the evidence that the defendants participated in a venture they knew or should have known engaged in the sex trafficking of, and as to, Plaintiff Jane Doe 2 at the Buckhead or Smyrna properties?⁵

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

⁵ Doe #1, 21 F.4th at 725 (“the defendant had constructive or actual knowledge that the undertaking or enterprise violated the TVPRA as to the plaintiff.”); *A.B. v. Hilton Worldwide Holdings, Inc.*, 484 F.Supp.3d 921, 938 (2020) (requiring the plaintiff to allege “Defendants knew or should have known of the alleged trafficking of Plaintiff A.B. on their corresponding properties.”); *see e.g.*, *J.C. v. I Shri Khodiyar, LLC*, 624 F. Supp. 3d 1307, 1319 (N.D. Ga. 2022) (finding knowledge was adequately plead because there were facts showing the defendant had constructive knowledge that the plaintiff herself was being trafficked); *J.G. v. Northbrook Indus., Inc.*, 619 F. Supp. 3d 1228, 1238 (N.D. Ga. 2022) (“the Court finds that Plaintiff has adequately alleged that Northbrook had actual or constructive knowledge of **Plaintiff's sex trafficking** at the United Inn.”); *A.D. v. Cavalier MergerSub LP*, No. 2:22-CV-649-JES-NPM, 2023 WL 3073599, at *4 (M.D. Fla. Apr. 25, 2023) (“Plaintiff must plausibly allege that Defendants at least constructively knew “ ‘that the venture in which they participated and from which they benefited violated the TVPRA as to’ A.D.”); *A.G. v. Northbrook Indus., Inc.*, No. 1:20-CV-05231-JPB, 2022 WL 1644921, at *4 (N.D. Ga. May 24, 2022) (“The Court finds that Plaintiff has adequately alleged that Defendant had actual or constructive knowledge of Plaintiff's sex trafficking at the hotel.”).

INSTRUCTION: If you answered yes to question #4, proceed to question #5. If you answered no, proceed directly to question 6#.

5. If you have answered yes in all of questions 1-4 for any defendant, enter a verdict on behalf of Jane Doe 2 against that Defendant for Plaintiff's TVPRA claim, sign the below, and proceed to Question #6.

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

RICO Claims:

6. Did Jane Doe 2 prove, by a preponderance of evidence, that that the defendants were involved in a pattern of racketeering activity or derived proceeds therefrom, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise, real property, or personal property of any nature, including money.⁶

“Pattern” means at least two incidents of racketeering activity in furtherance of one or more incidents, schemes, or transactions.⁷

“Racketeering activity” means to commit, to attempt to commit, or to solicit, coerce, or intimidate another person to commit, any crime which is chargeable by indictment under Georgia law.⁸

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #6, proceed to question #7. If you answered no, proceed directly to question #11.

7. Did Jane Doe 2 prove, by a preponderance of the evidence, that defendants intentionally aided and abetted in the commission of, or intentionally advised, encouraged, hired, or counseled another to commit the following crime:⁹ Keeping a Place of Prostitution?

A person commits the crime of keeping a place of prostitution if that person, having or exercising control over the use of any place, knowingly grants or permits the use of such place for the purpose of prostitution.¹⁰ Prostitution occurs when a

⁶ O.C.G.A. 16-14-4(a).

⁷ O.C.G.A. 16-14-3(4)(A).

⁸ O.C.G.A. 16-14-3(5)(A).

⁹ O.C.G.A. 16-2-20(b)(1-4).

¹⁰ O.C.G.A. 16-6-10.

person performs or offers or consents to perform a sexual act for money or other items of value.¹¹

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #7, proceed to question #8. If you answered no, proceed directly to question #11.

8. Do you find that Jane Doe 2 proved, by a preponderance of the evidence, that the defendants’ crimes were directed towards her, as opposed to third parties, and that she was an intended victim of the defendants’ actions.¹²

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #8, proceed to question #9. If you answered no, proceed directly to question 11.

¹¹ O.C.G.A. 16-6-9.

¹² *American General Life and Acc. Ins. Co. v. Ward*, 509 F.Supp.2d 1324, 1331 (N.D.GA 2007) (finding that a scheme intended to deprive an entire class of persons (there, African Americans) of benefits by charging higher premiums was not valid because the RICO violation was directed towards individuals other than the defendants); *Wylie v. Denton*, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015); *Maddox v. Southern Engineering Co.*, 231 Ga.App. 802, 806 (Ga Ct. App. 1998) (holding that RICO requires a showing that the injury “flowed directly from the defendant’s” conduct “not merely that his injury was an eventual consequence of the [predicate act] or that he would not have been injured but for the [predicate act.]”

9. Do you find that Jane Doe 2's alleged injury was directly caused, as opposed to an eventual consequence, of the defendants' violation of a crime.¹³

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

10. If you have answered yes in all of questions 6-9 for any defendant, enter a verdict on behalf of Jane Doe 2 against that Defendant for Plaintiff's RICO claim, sign the below, and proceed to Question 11.

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

_____	_____
_____	_____
_____	_____

¹³ Wylie v. Denton, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015)

RICO Conspiracy

11. Did Plaintiff Jane Doe 2, prove by a preponderance of the evidence, that the Defendants knowingly and willfully committed an overt act in effect of a conspiracy to traffic Jane Doe 2, or committed such an act, with Jane Doe 2's traffickers.¹⁴

Answer "Yes" or "No"

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

¹⁴ Doe #1, 21 F.4th at 728; O.C.G.A. §16-14-4(c).

Negligence claims:

12. Do you find that Jane Doe 2 proved by a preponderance of evidence that as to the Buckhead location only, any of the Defendants were negligent?

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #12, proceed to question #13. If you answered no, proceed directly to question 15.

13. Do you find that Jane Doe 2 proved by a preponderance of evidence that any of the Defendants’ negligence proximately caused her injuries.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #13, proceed to question #14. If you answered no, proceed directly to question 15.

14. If you have answered yes in all of questions 12-13 for any defendant, enter a verdict on behalf of Jane Doe 2 against that Defendant for Jane Doe 2’s negligence claims, sign the below, and proceed to Question 15.

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Damages:

15. If you answered Yes to Question 5, 10, 11, or 14 above, what amount of damages do you award to Jane Doe 2? If you answered No to Questions 5, 10, 11, and 14 above, do not answer Questions 15 – 19.

\$ _____

INSTRUCTION: Proceed to question 16. _____

16. To apportion Jane Doe 2's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

A Knight's Inn	_____ %
Best Value Inn by Vantage	_____ %
Cheshire Motor Inn	_____ %
FMW RRI NC, LLC (Smyrna)	_____ %
Homewood Suites	_____ %
Holiday Inn	_____ %
Hampton Inn	_____ %
Individuals that paid for sex with JD 1	_____ %
Jane Doe 1	_____ %
Laquinta Inn	_____ %
Mariott	_____ %
Microtel Inn & Suites	_____ %
Traffickers of Jane Doe 1	_____ %
Red Roof Inns, Inc.	_____ %
Red Roof Franchising, LLC	_____ %
Residence Inn	_____ %

RRI West Management, LLC	_____ %
RRI III, LLC (Buckhead)	_____ %
Suburban Extended Stay	_____ %
Varahi Hotel LLC	_____ %

The numbers must add up to 100%

INSTRUCTION: If you answered yes to Question 10, 11, or 14 proceed to Question 17. Otherwise, return this form to the bailiff.

17. Do you find that Jane Doe 2 proved by clear and convincing evidence that Defendants acted willfully or with malice, fraud, wantonness, oppression, or with a conscious indifference to consequences?¹⁵

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

INSTRUCTION: Proceed to question 18.

18. If you answered yes to Question 17, what amount of damages do you award to Jane Doe 2.

\$ _____

19. Divide that number in question 18 between each of the Defendants.

Red Roof Inns, Inc.	_____
Red Roof Franchising LLC	_____
RRI West Management, LLC	_____
RRI III, LLC (Buckhead)	_____

¹⁵ O.C.G.A. §51-12-5-1.

FMW RRI NC, LLC (Smyrna) _____

This is our unanimous verdict, reached on the _____ day of December, 2023

Foreperson

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that that submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 23, 2023

/s/ Marcella C. Ducca _____
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 23, 2023, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Dated: October 23, 2023

/s/ Marcella C. Ducca
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

ATTACHMENT I-2

DEFENDANTS' PROPOSED VERDICT FORM – JANE DOE 3

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jane Doe 3, et al.,)	
)	
Plaintiffs,)	
)	
)	Case No. 1:21-cv-04278-WMR
v.)	
)	
Red Roof Inns, Inc., et al.,)	
)	
Defendants.)	

DEFENDANT’S PROPOSED VERDICT FORM FOR PLAINTIFF
JANE DOE 3

Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC (collectively, “Defendants”) submit the following proposed jury interrogatories and verdict form for Plaintiff Jane Doe 3. Defendants reserve the right to supplement this proposed verdict form up to and during the time of trial. Specifically, Defendants anticipate various legal issues will be resolved by the Court throughout trial, and resolution of such will necessitate or negate jury interrogatories. To the extent the Court determines issues of fact on various issues that may be presented to the jury, Defendants expressly reserve the right add, subtract, replace, or modify any requested interrogatory.

Further, Defendants have drafted this form using Plaintiff's pseudonym given the verdict form is to be filed. However, Defendants believe Plaintiff's true identity should be used at trial and in this verdict form when it is given to the jury.

Dated: October 23, 2023

Respectfully submitted,

/s/ Marcella C. Ducca

Marcella C. Ducca (Ga Bar No. 115079)

Brandon D. Cox (Ga Bar No. 832025)

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Attorneys for Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC

TVPRA Claims:

1. Do you find Jane Doe 3 proved by a preponderance of the evidence that she was sex trafficked by force, fraud, or coercion, in violation of the Trafficking Victims Protection Act?¹

Answer “Yes” or “No”

____ Yes ____ No

INSTRUCTION: If you answered yes to question #1, proceed to question #2. If you answered no, proceed directly to question #6.

2. Do you find Jane Doe 3 proved by a preponderance of the evidence that each defendant participated in a venture with her traffickers?

“Venture” means an undertaking or enterprise involving risk and potential profit.²

Answer “Yes” or “No”

Red Roof Inns, Inc.	____ Yes ____ No
Red Roof Franchising LLC	____ Yes ____ No
RRI West Management, LLC	____ Yes ____ No
RRI III, LLC (Buckhead)	____ Yes ____ No
FMW RRI NC, LLC (Smyrna)	____ Yes ____ No

INSTRUCTION: If you answered yes to question #2, proceed to question #3. If you answered no, proceed directly to question #6.

3. Do you find that Jane Doe 3 proved by a preponderance of the evidence that each defendant knowingly benefited from participation in a venture with her traffickers?³

A venture is defined as a common undertaking or enterprise involving risk and potential profit.⁴

¹ Doe #1 v. Red Roof Inns, Inc., 21 F.4th 714, 723 (11th Dist. 2021); 18 U.S.C. §1591(b)(1).

² Doe #1, 21 F.4th at 719.

³ Doe #1, 21 F.4th at 724-725; 18 U.S.C. § 1595(a).

⁴ Doe #1, 21 F.4th at 274-275.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

INSTRUCTION: If you answered yes to question #3, proceed to question #4. If you answered no, proceed directly to question #6.

4. Do you find that Jane Doe 3 proved by a preponderance of the evidence that the defendants participated in a venture they knew or should have known engaged in the sex trafficking of, and as to, Plaintiff Jane Doe 3 at the Buckhead or Smyrna properties?⁵

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

⁵ Doe #1, 21 F.4th at 725 (“the defendant had constructive or actual knowledge that the undertaking or enterprise violated the TVPRA as to the plaintiff.”); *A.B. v. Hilton Worldwide Holdings, Inc.*, 484 F.Supp.3d 921, 938 (2020) (requiring the plaintiff to allege “Defendants knew or should have known of the alleged trafficking of Plaintiff A.B. on their corresponding properties.”); *see e.g., J.C. v. I Shri Khodiyar, LLC*, 624 F. Supp. 3d 1307, 1319 (N.D. Ga. 2022) (finding knowledge was adequately plead because there were facts showing the defendant had constructive knowledge that the plaintiff herself was being trafficked); *J.G. v. Northbrook Indus., Inc.*, 619 F. Supp. 3d 1228, 1238 (N.D. Ga. 2022) (“the Court finds that Plaintiff has adequately alleged that Northbrook had actual or constructive knowledge of **Plaintiff's sex trafficking** at the United Inn.”); *A.D. v. Cavalier MergerSub LP*, No. 2:22-CV-649-JES-NPM, 2023 WL 3073599, at *4 (M.D. Fla. Apr. 25, 2023) (“Plaintiff must plausibly allege that Defendants at least constructively knew “ ‘that the venture in which they participated and from which they benefited violated the TVPRA as to’ A.D.”); *A.G. v. Northbrook Indus., Inc.*, No. 1:20-CV-05231-JPB, 2022 WL 1644921, at *4 (N.D. Ga. May 24, 2022) (“The Court finds that Plaintiff has adequately alleged that Defendant had actual or constructive knowledge of Plaintiff's sex trafficking at the hotel.”).

INSTRUCTION: If you answered yes to question #4, proceed to question #5. If you answered no, proceed directly to question 6#.

5. If you have answered yes in all of questions 1-4 for any defendant, enter a verdict on behalf of Jane Doe 3 against that Defendant for Plaintiff's TVPRA claim, sign the below, and proceed to Question #6.

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

RICO Claims:

6. Did Jane Doe 3 prove, by a preponderance of evidence, that that the defendants were involved in a pattern of racketeering activity or derived proceeds therefrom, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise, real property, or personal property of any nature, including money.⁶

“Pattern” means at least two incidents of racketeering activity in furtherance of one or more incidents, schemes, or transactions.⁷

“Racketeering activity” means to commit, to attempt to commit, or to solicit, coerce, or intimidate another person to commit, any crime which is chargeable by indictment under Georgia law.⁸

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #6, proceed to question #7. If you answered no, proceed directly to question #11.

7. Did Jane Doe 3 prove, by a preponderance of the evidence, that defendants intentionally aided and abetted in the commission of, or intentionally advised, encouraged, hired, or counseled another to commit the following crime:⁹ Keeping a Place of Prostitution?

A person commits the crime of keeping a place of prostitution if that person, having or exercising control over the use of any place, knowingly grants or permits the use of such place for the purpose of prostitution.¹⁰ Prostitution occurs when a

⁶ O.C.G.A. 16-14-4(a).

⁷ O.C.G.A. 16-14-3(4)(A).

⁸ O.C.G.A. 16-14-3(5)(A).

⁹ O.C.G.A. 16-2-20(b)(1-4).

¹⁰ O.C.G.A. 16-6-10.

person performs or offers or consents to perform a sexual act for money or other items of value.¹¹

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #7, proceed to question #8. If you answered no, proceed directly to question #11.

8. Do you find that Jane Doe 3 proved, by a preponderance of the evidence, that the defendants’ crimes were directed towards her, as opposed to third parties, and that she was an intended victim of the defendants’ actions.¹²

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #8, proceed to question #9. If you answered no, proceed directly to question 11.

¹¹ O.C.G.A. 16-6-9.

¹² *American General Life and Acc. Ins. Co. v. Ward*, 509 F.Supp.2d 1324, 1331 (N.D.GA 2007) (finding that a scheme intended to deprive an entire class of persons (there, African Americans) of benefits by charging higher premiums was not valid because the RICO violation was directed towards individuals other than the defendants); *Wylie v. Denton*, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015); *Maddox v. Southern Engineering Co.*, 231 Ga.App. 802, 806 (Ga Ct. App. 1998) (holding that RICO requires a showing that the injury “flowed directly from the defendant’s” conduct “not merely that his injury was an eventual consequence of the [predicate act] or that he would not have been injured but for the [predicate act.]”

9. Do you find that Jane Doe 3's alleged injury was directly caused, as opposed to an eventual consequence, of the defendants' violation of a crime.¹³

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

10. If you have answered yes in all of questions 6-9 for any defendant, enter a verdict on behalf of Jane Doe 3 against that Defendant for Plaintiff's RICO claim, sign the below, and proceed to Question 11.

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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¹³ Wylie v. Denton, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015)

RICO Conspiracy

11. Did Plaintiff Jane Doe 3, prove by a preponderance of the evidence, that the Defendants knowingly and willfully committed an overt act in effect of a conspiracy to traffic Jane Doe 3, or committed such an act, with Jane Doe 3's traffickers.¹⁴

Answer "Yes" or "No"

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

¹⁴ Doe #1, 21 F.4th at 728; O.C.G.A. §16-14-4(c).

Negligence claims:

12. Do you find that Jane Doe 3 proved by a preponderance of evidence that as to the Buckhead location only, any of the Defendants were negligent?

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #12, proceed to question #13. If you answered no, proceed directly to question 15.

13. Do you find that Jane Doe 3 proved by a preponderance of evidence that any of the Defendants’ negligence proximately caused her injuries.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #13, proceed to question #14. If you answered no, proceed directly to question 15.

14. If you have answered yes in all of questions 12-13 for any defendant, enter a verdict on behalf of Jane Doe 3 against that Defendant for Jane Doe 3’s negligence claims, sign the below, and proceed to Question 15.

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Damages:

15. If you answered Yes to Question 5, 10, 11, or 14 above, what amount of damages do you award to Jane Doe 3? If you answered No to Questions 5, 10, 11, and 14 above, do not answer Questions 15 – 19.

\$ _____

INSTRUCTION: Proceed to question 16. _____

16. To apportion Jane Doe 3's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

A Knight's Inn	_____ %
Best Value Inn by Vantage	_____ %
Cheshire Motor Inn	_____ %
FMW RRI NC, LLC (Smyrna)	_____ %
Homewood Suites	_____ %
Holiday Inn	_____ %
Hampton Inn	_____ %
Individuals that paid for sex with JD 1	_____ %
Jane Doe 1	_____ %
Laquinta Inn	_____ %
Mariott	_____ %
Microtel Inn & Suites	_____ %
Traffickers of Jane Doe 1	_____ %
Red Roof Inns, Inc.	_____ %
Red Roof Franchising, LLC	_____ %
Residence Inn	_____ %

RRI West Management, LLC	_____ %
RRI III, LLC (Buckhead)	_____ %
Suburban Extended Stay	_____ %
Varahi Hotel LLC	_____ %

The numbers must add up to 100%

INSTRUCTION: If you answered yes to Question 10, 11, or 14 proceed to Question 17. Otherwise, return this form to the bailiff.

17. Do you find that Jane Doe 3 proved by clear and convincing evidence that Defendants acted willfully or with malice, fraud, wantonness, oppression, or with a conscious indifference to consequences?¹⁵

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

INSTRUCTION: Proceed to question 18.

18. If you answered yes to Question 17, what amount of damages do you award to Jane Doe 3.

\$ _____

19. Divide that number in question 18 between each of the Defendants.

Red Roof Inns, Inc.	_____
Red Roof Franchising LLC	_____
RRI West Management, LLC	_____
RRI III, LLC (Buckhead)	_____
FMW RRI NC, LLC (Smyrna)	_____

¹⁵ O.C.G.A. §51-12-5-1.

This is our unanimous verdict, reached on the ____ day of December, 2023

Foreperson

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that that submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 23, 2023

/s/ Marcella C. Ducca _____
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 23, 2023, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Dated: October 23, 2023

/s/ Marcella C. Ducca
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

ATTACHMENT I-2

DEFENDANTS' PROPOSED VERDICT FORM — JANE DOE 4

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jane Doe 4, et al.,)	
)	
Plaintiffs,)	
)	
)	Case No. 1:21-cv-04278-WMR
v.)	
)	
Red Roof Inns, Inc., et al.,)	
)	
Defendants.)	

DEFENDANT’S PROPOSED VERDICT FORM FOR PLAINTIFF
JANE DOE 4

Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC (collectively, “Defendants”) submit the following proposed jury interrogatories and verdict form for Plaintiff Jane Doe 4. Defendants reserve the right to supplement this proposed verdict form up to and during the time of trial. Specifically, Defendants anticipate various legal issues will be resolved by the Court throughout trial, and resolution of such will necessitate or negate jury interrogatories. To the extent the Court determines issues of fact on various issues that may be presented to the jury, Defendants expressly reserve the right add, subtract, replace, or modify any requested interrogatory.

Further, Defendants have drafted this form using Plaintiff's pseudonym given the verdict form is to be filed. However, Defendants believe Plaintiff's true identity should be used at trial and in this verdict form when it is given to the jury.

Dated: October 23, 2023

Respectfully submitted,

/s/ Marcella C. Ducca

Marcella C. Ducca (Ga Bar No. 115079)

Brandon D. Cox (Ga Bar No. 832025)

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Attorneys for Defendants Red Roof Inns, Inc., FMW RRI NC, LLC, Red Roof Franchising, LLC, RRI West Management, LLC, and RRI III, LLC

TVPRA Claims:

1. Do you find Jane Doe 4 proved by a preponderance of the evidence that she was sex trafficked by force, fraud, or coercion, in violation of the Trafficking Victims Protection Act?¹

Answer “Yes” or “No”

☐ **Yes** ☐ **No**

INSTRUCTION: If you answered yes to question #1, proceed to question #2. If you answered no, proceed directly to question #6.

2. Do you find Jane Doe 4 proved by a preponderance of the evidence that each defendant participated in a venture with her traffickers?

“Venture” means an undertaking or enterprise involving risk and potential profit.²

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #2, proceed to question #3. If you answered no, proceed directly to question #6.

3. Do you find that Jane Doe 4 proved by a preponderance of the evidence that each defendant knowingly benefited from participation in a venture with her traffickers?³

A venture is defined as a common undertaking or enterprise involving risk and potential profit.⁴

¹ Doe #1 v. Red Roof Inns, Inc., 21 F.4th 714, 723 (11th Dist. 2021); 18 U.S.C. §1591(b)(1).

² Doe #1, 21 F.4th at 719.

³ Doe #1, 21 F.4th at 724-725; 18 U.S.C. § 1595(a).

⁴ Doe #1, 21 F.4th at 274-275.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

INSTRUCTION: If you answered yes to question #3, proceed to question #4. If you answered no, proceed directly to question #6.

4. Do you find that Jane Doe 4 proved by a preponderance of the evidence that the defendants participated in a venture they knew or should have known engaged in the sex trafficking of, and as to, Plaintiff Jane Doe 4 at the Buckhead or Smyrna properties?⁵

Answer “Yes” or “No”

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

⁵ Doe #1, 21 F.4th at 725 (“the defendant had constructive or actual knowledge that the undertaking or enterprise violated the TVPRA as to the plaintiff.”); *A.B. v. Hilton Worldwide Holdings, Inc.*, 484 F.Supp.3d 921, 938 (2020) (requiring the plaintiff to allege “Defendants knew or should have known of the alleged trafficking of Plaintiff A.B. on their corresponding properties.”); *see e.g., J.C. v. I Shri Khodiyar, LLC*, 624 F. Supp. 3d 1307, 1319 (N.D. Ga. 2022) (finding knowledge was adequately plead because there were facts showing the defendant had constructive knowledge that the plaintiff herself was being trafficked); *J.G. v. Northbrook Indus., Inc.*, 619 F. Supp. 3d 1228, 1238 (N.D. Ga. 2022) (“the Court finds that Plaintiff has adequately alleged that Northbrook had actual or constructive knowledge of **Plaintiff's sex trafficking** at the United Inn.”); *A.D. v. Cavalier MergerSub LP*, No. 2:22-CV-649-JES-NPM, 2023 WL 3073599, at *4 (M.D. Fla. Apr. 25, 2023) (“Plaintiff must plausibly allege that Defendants at least constructively knew “ ‘that the venture in which they participated and from which they benefited violated the TVPRA as to’ A.D.”); *A.G. v. Northbrook Indus., Inc.*, No. 1:20-CV-05231-JPB, 2022 WL 1644921, at *4 (N.D. Ga. May 24, 2022) (“The Court finds that Plaintiff has adequately alleged that Defendant had actual or constructive knowledge of Plaintiff's sex trafficking at the hotel.”).

INSTRUCTION: If you answered yes to question #4, proceed to question #5. If you answered no, proceed directly to question 6#.

5. If you have answered yes in all of questions 1-4 for any defendant, enter a verdict on behalf of Jane Doe 4 against that Defendant for Plaintiff's TVPRA claim, sign the below, and proceed to Question #6.

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

RICO Claims:

6. Did Jane Doe 4 prove, by a preponderance of evidence, that the defendants were involved in a pattern of racketeering activity or derived proceeds therefrom, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise, real property, or personal property of any nature, including money.⁶

“Pattern” means at least two incidents of racketeering activity in furtherance of one or more incidents, schemes, or transactions.⁷

“Racketeering activity” means to commit, to attempt to commit, or to solicit, coerce, or intimidate another person to commit, any crime which is chargeable by indictment under Georgia law.⁸

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #6, proceed to question #7. If you answered no, proceed directly to question #11.

7. Did Jane Doe 4 prove, by a preponderance of the evidence, that defendants intentionally aided and abetted in the commission of, or intentionally advised, encouraged, hired, or counseled another to commit the following crime:⁹ Keeping a Place of Prostitution?

A person commits the crime of keeping a place of prostitution if that person, having or exercising control over the use of any place, knowingly grants or permits the use of such place for the purpose of prostitution.¹⁰ Prostitution occurs when a

⁶ O.C.G.A. 16-14-4(a).

⁷ O.C.G.A. 16-14-3(4)(A).

⁸ O.C.G.A. 16-14-3(5)(A).

⁹ O.C.G.A. 16-2-20(b)(1-4).

¹⁰ O.C.G.A. 16-6-10.

person performs or offers or consents to perform a sexual act for money or other items of value.¹¹

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #7, proceed to question #8. If you answered no, proceed directly to question #11.

8. Do you find that Jane Doe 4 proved, by a preponderance of the evidence, that the defendants’ crimes were directed towards her, as opposed to third parties, and that she was an intended victim of the defendants’ actions.¹²

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #8, proceed to question #9. If you answered no, proceed directly to question 11.

¹¹ O.C.G.A. 16-6-9.

¹² *American General Life and Acc. Ins. Co. v. Ward*, 509 F.Supp.2d 1324, 1331 (N.D.GA 2007) (finding that a scheme intended to deprive an entire class of persons (there, African Americans) of benefits by charging higher premiums was not valid because the RICO violation was directed towards individuals other than the defendants); *Wylie v. Denton*, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015); *Maddox v. Southern Engineering Co.*, 231 Ga.App. 802, 806 (Ga Ct. App. 1998) (holding that RICO requires a showing that the injury “flowed directly from the defendant’s” conduct “not merely that his injury was an eventual consequence of the [predicate act] or that he would not have been injured but for the [predicate act].”)

9. Do you find that Jane Doe 4's alleged injury was directly caused, as opposed to an eventual consequence, of the defendants' violation of a crime.¹³

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

- 10.If you have answered yes in all of questions 6-9 for any defendant, enter a verdict on behalf of Jane Doe 4 against that Defendant for Plaintiff's RICO claim, sign the below, and proceed to Question 11.

Answer "Yes" or "No"

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
FMW RRI NC, LLC (Smyrna)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

¹³ Wylie v. Denton, 746 S.E.2d 689, 694 (Ga. Ct. App. 2015)

RICO Conspiracy

11. Did Plaintiff Jane Doe 4, prove by a preponderance of the evidence, that the Defendants knowingly and willfully committed an overt act in effect of a conspiracy to traffic Jane Doe 4, or committed such an act, with Jane Doe 4's traffickers.¹⁴

Answer "Yes" or "No"

Red Roof Inns, Inc.	<u> </u> Yes	<u> </u> No
Red Roof Franchising LLC	<u> </u> Yes	<u> </u> No
RRI West Management, LLC	<u> </u> Yes	<u> </u> No
RRI III, LLC (Buckhead)	<u> </u> Yes	<u> </u> No
FMW RRI NC, LLC (Smyrna)	<u> </u> Yes	<u> </u> No

¹⁴ Doe #1, 21 F.4th at 728; O.C.G.A. §16-14-4(c).

Negligence claims:

12. Do you find that Jane Doe 4 proved by a preponderance of evidence that as to the Buckhead location only, any of the Defendants were negligent?

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #12, proceed to question #13. If you answered no, proceed directly to question 15.

13. Do you find that Jane Doe 4 proved by a preponderance of evidence that any of the Defendants’ negligence proximately caused her injuries.

Answer “Yes” or “No”

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

INSTRUCTION: If you answered yes to question #13, proceed to question #14. If you answered no, proceed directly to question 15.

14. If you have answered yes in all of questions 12-13 for any defendant, enter a verdict on behalf of Jane Doe 4 against that Defendant for Jane Doe 4’s negligence claims, sign the below, and proceed to Question 15.

Red Roof Inns, Inc.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Red Roof Franchising LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI West Management, LLC	<input type="checkbox"/> Yes	<input type="checkbox"/> No
RRI III, LLC (Buckhead)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Damages:

15. If you answered Yes to Question 5, 10, 11, or 14 above, what amount of damages do you award to Jane Doe 4? If you answered No to Questions 5, 10, 11, and 14 above, do not answer Questions 15 – 19.

\$ _____

INSTRUCTION: Proceed to question 16. _____

16. To apportion Jane Doe 4's damages, assess the percentage of fault of those Defendants you found liable as well as any other person listed below that you also find to be at fault:

A Knight's Inn	_____ %
Best Value Inn by Vantage	_____ %
Cheshire Motor Inn	_____ %
FMW RRI NC, LLC (Smyrna)	_____ %
Homewood Suites	_____ %
Holiday Inn	_____ %
Hampton Inn	_____ %
Individuals that paid for sex with JD 1	_____ %
Jane Doe 1	_____ %
Laquinta Inn	_____ %
Mariott	_____ %
Microtel Inn & Suites	_____ %
Traffickers of Jane Doe 1	_____ %
Red Roof Inns, Inc.	_____ %
Red Roof Franchising, LLC	_____ %
Residence Inn	_____ %

RRI West Management, LLC	_____ %
RRI III, LLC (Buckhead)	_____ %
Suburban Extended Stay	_____ %
Varahi Hotel LLC	_____ %

The numbers must add up to 100%

INSTRUCTION: If you answered yes to Question 10, 11, or 14 proceed to Question 17. Otherwise, return this form to the bailiff.

17. Do you find that Jane Doe 4 proved by clear and convincing evidence that Defendants acted willfully or with malice, fraud, wantonness, oppression, or with a conscious indifference to consequences?¹⁵

Red Roof Inns, Inc.	_____ Yes	_____ No
Red Roof Franchising LLC	_____ Yes	_____ No
RRI West Management, LLC	_____ Yes	_____ No
RRI III, LLC (Buckhead)	_____ Yes	_____ No
FMW RRI NC, LLC (Smyrna)	_____ Yes	_____ No

INSTRUCTION: Proceed to question 18.

18. If you answered yes to Question 17, what amount of damages do you award to Jane Doe 4.

\$ _____

19. Divide that number in question 18 between each of the Defendants.

Red Roof Inns, Inc.	_____
Red Roof Franchising LLC	_____
RRI West Management, LLC	_____
RRI III, LLC (Buckhead)	_____
FMW RRI NC, LLC (Smyrna)	_____

¹⁵ O.C.G.A. §51-12-5-1.

This is our unanimous verdict, reached on the ____ day of December, 2023

Foreperson

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that that submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: October 23, 2023

/s/ Marcella C. Ducca _____
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 23, 2023, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Dated: October 23, 2023

/s/ Marcella C. Ducca
Marcella C. Ducca

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI NC, LLC, Red
Roof Franchising, LLC, RRI West
Management, LLC, and RRI III, LLC*

ATTACHMENT B-2

DEFENDANTS' VOIR DIRE QUESTIONS

Attachment “B-2” Defendants’ Voir Dire Questions

[Intro]

Members of the Jury Panel, I represent the Defendants in this case. I have some questions to ask you, and I want you to understand that I am not trying to pry into your personal life. The purpose of these questions is to determine if this case is the right case for you to serve as a juror. It might be that another case is better suited for you because of the subject matter.

We appreciate your honesty with us as I know that some of these questions are difficult to answer—and if there is an answer you do not want to give in open court, please just tell us that you prefer to speak to the lawyers in private. We can approach the bench for a side bar out of the hearing of the jury panel.

If you have any doubt about whether you should provide certain information in response to a question, please err on the side of telling us. It is really important that we have all of the information.

[Knowledge of the Witnesses and Attorneys]

1. Does anyone know the parties or witnesses in this case:
 - a. Plaintiffs
 - i. Chesney Elizabeth Diana Estes
 - ii. Shayna Marie Valerio
 - iii. Micaela Rajotte (nee Martin)
 - iv. Kristin Mari Krawczyk
 - b. Megan Harsch Corporate Rep of Red Roof Inns
 - c. Jay Moyer
 - d. Vickie Lam
 - e. Forrest Castille
 - f. Vanessa Cole
 - g. Michelle Sarkasian
 - h. George Limbert
 - i. Michael Thomas
 - j. Monica Hamilton
 - k. John Park
 - l. Andrew Alexander
 - m. Marina MacDonald

- n. Michelle Wehrle
 - o. Greg Stocker
 - p. Thomas McElroy
 - q. Michele Sarkisian
 - r. Brenda Conner
 - s. Vincent Vittatoo
 - t. Kimberly Mehlman-Orozco
 - u. Matthew Norman
 - v. Gregory Bristol
 - w. Alan Tallis
 - x. Anique Whitmore
 - y. Melanie J. Bliss
2. Does anyone know Plaintiffs' counsel in this case:
- a. Bondurant
 - i. Amanda Kay Seals
 - ii. John E. Floyd
 - iii. Juliana Mesa
 - iv. Manoj S. Varghese
 - v. Michael R. Baumrind
 - vi. Tiana S. Mykkeltvedt
 - b. Anderson Tate
 - i. Jonathan Tonge
 - ii. Patrick McDonough
3. Know anyone who works at these law firms?
4. Does anyone or their family members or close friends work for a law firm?
- a. Which one?
 - b. In what role?
5. Do any of you think you know any other member of the jury panel?
6. Is there anything about the anticipated length or daily schedule of trial that presents a problem, whether it be personal, business, or health, that is significant enough that you feel the need to be excused from service on this jury?
7. Does anyone know the following pimps?
- a. Jayson Johnson also known as "CB" or "Gutta"
 - b. "Black"
 - c. Martez Marquel Fuque also known as "Diablo"
 - d. Ernest Floyd Wright III also known as "Bagz"

- e. Lance Mason Lamar also known as “Chi”
- f. Eddie Lee Davis also known as “Big E”
- g. Anthony Shiver or Anthony Shivers also known as “Ant”
- h. Anthony Gomez
- i. Dexter Stroud as known as “Southside”
- j. Gabe Martinez
- k. Jacob Rodriquez also known as “Chico”
- l. Jerome Rutledge also known as “Kwan” or “Quan”
- m. Massaba Tyson
- n. Michael Tyrone Rutledge also known as “Nitty” or “Big Mike”
- o. Tradelle Lacy also known as “Tricky” or “T”
- p. “Xavier”
- q. Marvin Holly also known as “Paris”
- r. Anthony Crumley also known as “Crum”
- s. “Applehead”
- t. “Cashmere”
- u. “Cliff”
- v. “Kwazi”
- w. “Phoenix”
- x. “Swazie”
- y. “Uncle Barry”
- z. “Zeke”
- aa. Alfred L Armstead also known as “Gutta”
- bb. Bruce Bibbero Eric
- cc. Carles Blackman
- dd. Michael Beene also known as “Fresh”
- ee. Walter Lewis also known as “Panama”
- ff. “Strake”

8. Have you or anyone in your family ever been employed by the following hotels?

- a. Varahi
- b. Hilton Worldwide Holdings
- c. Hilton Franchise Holdings LLC
- d. Hilton Domestic Operating Company, Inc.
- e. JHM Atlanta Hotel Associates Limited Partnership
- f. Hampton Inn in Atlanta

- g. CBM Two Hotels LP
- h. Courtyard by Marriott in Duluth, GA
- i. PHF II Buckhead
- j. Atlanta Marriott Buckhead Hotel & Conference Center
- k. Pyramid Atlanta Management LLC
- l. Stablegold Hospitality LLC
- m. Economy Hotel f/k/a Atlanta Hotel in Roswell, GA
- n. Four Seasons Hotel Limited
- o. The Ritz Carlton Hotel
- p. Imperial Investments Doraville, Inc.
- q. Clarion Hotel & Conference Center North America in Doraville, GA
- r. Choice Hotels International, Inc.
- s. U.S. South Hospitality, Inc.
- t. Holiday Inn in Roswell, GA
- u. Inter-Continental Hotels Corporation
- v. Holiday Hospitality Franchising LLC
- w. Dhanlaxmi Hospitality, Inc.
- x. La Quinta Inn in Kennesaw, GA
- y. La Quinta Worldwide LLC
- z. La Quinta Holdings, Inc.
- aa. CPLG Hol, LLC
- bb. CPLG-LQ Properties LLC
- cc. Corepoint Lodging Inc.
- dd. LQ Management LLC
- ee. Jeet & JJ LLC
- ff. Ramada Limited Suites n/k/a Ramada by Wyndham in Alpharetta, GA
- gg. Legacy AMH-B, LLC
- hh. The American Hotel Atlanta Downtown-a Doubletree by Hilton
- ii. JHM Atlanta Hotel Associates Limited Partnership
- jj. Laxmi Druid Hills Hotel LLC
- kk. CIS Marietta LLC
- ll. Comfort Inn and Suites at Smyrna, GA
- mm. Imperial Investments Doraville, Inc.
- nn. LM-Atlanta Perimeter Inc.
- oo. Holiday Inn Express in Chamblee, GA
- pp. Inter-Continental Hotels Corporation
- qq. Holiday Hospitality Franchising LLC

rr. LQ Properties LLC
ss. Peachtree Hospitality Management LLC
tt. 560 Greers LLC
uu. Marrietta Motel

[Prior Experience with Judicial System]

1. Have you ever served on a jury before?
 - a. What kind of case?
 - b. What was the result?
2. Have you ever served as a foreperson of a jury?
 - a. When?
 - b. What kind of case?
 - c. What was the result?
3. Have any of you or the members of your family ever made a claim for personal injury or workers' compensation?
 - a. Type of claim?
 - b. Status?
4. Have any of you or members of your family ever brought a lawsuit for personal injury or workers compensation?
 - a. What type of lawsuit?
 - b. Status?
5. Have you or any members of your family been sued by anyone else?
 - a. What type of lawsuit?
 - b. Status?
6. Have you ever been a witness in a court case?
 - a. When?
 - b. What kind?

[Specialized Knowledge Relevant to the Case]

1. Have you or anyone in your family ever been employed by Red Roof Inn?
 - a. When?
 - b. For how long?
 - c. In what capacity?
 - d. Why did you leave your employment?
 - e. Were you satisfied with your experience there?
2. Have you or anyone in your family ever been employed at a hotel or inn?
 - a. When?

- b. For how long?
 - c. In what capacity?
 - d. Why did you leave your employment there?
- 3. Has anyone ever heard of budget hotels?
 - a. What do you know about it?
 - b. Ever stayed at any?
 - c. How was your experience?
 - d. Did the hotel address your concerns adequately?
- 4. Have you ever had an experience at a hotel or motel that would prevent you from being fair in this case?
- 5. Have you or anyone in your family ever worked in the hospitality industry? Hotels, Airlines, etc.
 - a. When?
 - b. For how long?
 - c. In what capacity?
- 6. Do you or any of the members of your immediate family have any legal training?
 - a. Who?
 - b. What type?
- 7. Have you or any of the members of your immediate family ever worked at a law firm?
 - a. Which one?
 - b. What role?
- 8. Have you or any of the members of your family worked in law enforcement?
 - a. Who?
 - b. What role?
- 9. Do you or any of the members of your immediate family have any training in security or providing security for a business?
 - a. Describe training
- 10. Do you or any of the members of your immediate family have any certifications in security?
 - a. Describe
- 11. Do you or any of the members of your immediate family have any expertise or training in psychology, psychiatry, or counseling?
 - a. Who?
 - b. What?

12. Do you or any of the members of your immediate family work with victims of crime or trauma?
- Who?
 - What role?

[Questions about Crime]

- Have you or any members of your immediate family been the victim of a crime?
 - When?
 - What?
 - Did you press charges?
 - If so, what was the result?
- Have you or any members of your immediate family ever witnessed a crime?
 - What kind?
 - Did you testify in Court?
- Have you ever thought you witnessed a crime but you were not sure?
 - What did you do about it?
- Ever been arrested for a crime?
 - What?
 - When?
 - What happened with the charges?
- You or a family member or close friend had an encounter with law enforcement that was negative?
 - What happened?
- Have you ever encountered someone that you thought was a prostitute?
 - What did you do about it?
- Who knows what a pimp is?
- Do you know what a John is?
- Who knows what a trick is with respect to prostitution
- Do you know what a bottom bitch is?
- Who knows what sex trafficking is?
- Do you know what a clandestine crime is?
- Does anyone disagree that prostitution is different than sex trafficking? Any of you feel like prostitution should be legal? Why or why not?
- How many of you believe a police officer is in the best place to make a determination of prostitution versus human trafficking.

15. Who believes there is an expectation of privacy in hotel rooms
16. Do you have an opinion on when a hotel should call the cops on its customers?
 - a. How obvious does the crime have to be?
17. Who is familiar with the following social media apps?
 - a. Backpage?
 - b. Tagged?
 - c. Eros
 - d. Friend Finder Network d/b/a Adult Friend Finder
 - e. Craigslist, Inc.

[Private Questions Related to Sensitive Subjects]

1. This case involves testimony and photographs of each Plaintiff related to sex, nudity, and prostitution. Do any of you have particular concerns about the subject matter?
2. The evidence will include photographs Plaintiffs send to various Johns and other third parties depicting nudity and sex. Do any of you have particular concerns about this type of evidence?
3. Have you or anyone from your immediate family or a close friend experienced a sexual assault of any kind?
 - a. When?
 - b. What?
4. Have you or any member of your family or a close friend been in an abusive relationship?
 - a. Who?
 - b. What happened?
 - c. Type of abuse?
5. Are you familiar with PTSD?
 - a. Describe.
 - b. What types of trauma cause PTSD?
 - c. How do you expect someone who has PTSD to behave?
 - d. Have you heard of avoidance in the context of PTSD
6. Have any of you had any major turmoil in your life in the past 5 years (lose a job, house fire, divorce, health scare or an accident that threw you for a loop?)
 - a. Without too much detail, what happened?
 - b. Have you recovered?

7. Have any of you or your family members experienced a significant financial hardship like losing your job, filing for bankruptcy, foreclosure on your home, etc. in the past several years?
 - a. Is that still affecting you?
8. Has anyone had anything happen to them, or to a loved one, that would make them more likely to identify with the Plaintiffs in this case?
9. Has anyone ever felt like they were judged based on their physical appearance? How did that make you feel?

[Questions Related to Fairness]

1. Do any of you believe that because plaintiffs filed a lawsuit that they are entitled to recover from the Defendants?
2. Is there anybody who feels like the Plaintiffs are slightly ahead from the beginning?
3. Do any of believe that because plaintiffs filed a lawsuit that Defendants must have done something wrong?
4. Is there anyone who would not be comfortable returning a defense verdict here if Plaintiffs do not meet their burden of proof?
5. Do any of you have a bias against the Defendants because they are corporations?
6. Will you be able to apply the law to the facts of this case even if you do not agree with the law?
7. One of the Plaintiffs in this case is deceased. Would that cause you to favor that Plaintiff or any of the Plaintiffs in this case?
8. Does anybody think they are not going to be able to put aside feelings of sympathy for the deceased Plaintiff or her family?
9. We expect Plaintiffs to introduce some evidence of traumatic events in the lives of these Plaintiffs. Without hearing more, is there anyone that is concerned that might cause you to favor the Plaintiffs even if just a little bit?
10. The Court has determined that the four Plaintiffs can bring their claims against Red Roof Inns at the same time in the same trial. But Plaintiffs have individual stories.
 - a. Do any of you have concerns about your ability to keep the different stories of the Plaintiffs sorted between them?
 - b. Anyone that won't be able to separate the claims of each Plaintiff and decide them on their own facts?

11. Anybody not comfortable finding that one or more of the Plaintiffs did not meet their burden of proof?
12. Anybody not understand that even though these claims are being tried together that each Plaintiff must meet their burden of proof?
 - a.

[General Questions for Background]

1. Do you have children?
2. What is your occupation?
3. Do you have a college degree?
4. Advanced degree?
5. Have you ever owned a business?
 - a. When?
 - b. What kind?
 - c. Number of employees?
 - d. Did your employees ever break the rules?
 - e. Did they ever do anything that you told them not to do?
6. Have you or any member of your family been active in, or members of church-related organizations, unions, social clubs, or political groups?
 - a. What organizations?
 - b. What activities?
7. Have you or your immediate family members ever served on the board of a charitable organization?
 - a. what organization?
 - b. When?
8. Do you use social media?
 - a. Which ones?
 - b. Would you describe yourself as very active or inactive on social media?
9. My older daughter is a rule follower. My younger daughter is the opposite—more of a free spirit. Would you say you are like my older daughter, my younger daughter or somewhere in between?
10. Have you ever been accused of something you didn't do?
 - a. What was it?
 - b. How did you handle that?

[Money]

1. Is there anybody that feels like the amount of money juries award is too low or too high?
 - a. Why?
2. In general, who thinks that \$1 Million is not a lot of money?
3. Do you know how long it takes an average household to earn \$1 Million?

[Franchisor/Franchisee Issues]

1. How many of you understand what I mean by a franchisee?
2. How many of you think because the Golden Arches or the name McDonald's is on the burger joint down the street that the corporate office of McDonald's is responsible for whatever happens at that burger joint down the street here in Atlanta?
3. If someone commits a crime at the McDonald's down the street, is the corporate office of McDonald's responsible for that crime? Why or why not?

[Knowledge of Area in Georgia]

1. Are any of you familiar with Smyrna, GA? How about Buckhead?
2. What do you know about this area?